

Message

From: Leslie Stuart [Leslie.Stuart@us.indorama.net]
Sent: 5/10/2021 3:39:40 PM
To: Casso, Ruben [Casso.Ruben@epa.gov]
CC: Kim Knotts [Kim.Knotts@us.indorama.net]
Subject: Re: Indorama Ethylene Oxide Data Request
Attachments: Final EPA EO Meeting Presentation Update 1.pdf

Ruben,
Here are the answers to your three questions.

#1 & #2- I have attached an update to the presentation where I added the data labels for the emissions graph.

#3-
2016

- 25,288 lb EO reduction. Indorama discovered in review that emissions of another compound were incorrectly added to the EO number.

2017

- 27,967 lb EO reduction. TCEQ/Indorama review of EI numbers discovered an over reporting of EO emissions. The EI was updated at that time, but the TRI was not updated to match. This was recently discovered, and the TRI was updated.

2019

- 14,148 lb EO increase over all. There were two updates made – one increase and one decrease.
 - 15,416 lb EO increase. Indorama review of EI and TRI numbers discovered an error in reporting of EO emissions. The TRI was updated to match the EI.
 - 1,268 lb EO decrease. Indorama review discovered that an incorrectly low DRE was being used in a calculation, which resulted in higher emissions. This was updated in the EI, and has now been updated in the TRI to match.

Please let me know if you have any more questions.

Leslie Stuart
Manager, Environmental & Sustainability
Indorama Ventures Oxides, LLC

From: Casso, Ruben <Casso.Ruben@epa.gov>
Sent: Wednesday, May 5, 2021 11:27 AM
To: Leslie Stuart <Leslie.Stuart@us.indorama.net>
Cc: Kim Knotts <Kim.Knotts@us.indorama.net>
Subject: RE: Indorama Ethylene Oxide Data Request

[External Email]

Ms. Stuart,

I have the following questions on the information Indorama provided. Hopefully the questions won't be too difficult for Indorama to respond to. Thank you for your assistance.

Ruben Casso
Air Toxics Coordinator
EPA Region 6

EO Emissions (2014-2019) slide

1. Will Indorama please provide us with the numerical 2020 EO emissions total? It's hard to know what that precise value is from the bar chart.
2. It would also be helpful to get the numerical emission values for the other years presented in the bar chart as well, especially if they differ from what was previously reported to EPA or TCEQ.
3. The slide states: "Updates were made to TRI reports for years 2016, 2017, and 2019. Total changes resulted in a 39,000 lb reduction of EO emissions." Overall, we are trying to understand both the changes in reported EO emissions from emissions reporting refinements and the changes in actual EO emissions. Will Indorama please provide more details on how those changes in reported emissions occurred? For example, the LDAR slide briefly explains a 1,300 lb reduction in calculated EO emissions in 2020. That's the kind of short explanation we would like for the 39,000 lb TRI report changes in 2016, 2017 and 2019.

From: Leslie Stuart <Leslie.Stuart@us.indorama.net>
Sent: Tuesday, May 4, 2021 5:23 PM
To: Casso, Ruben <Casso.Ruben@epa.gov>
Cc: Kim Knotts <Kim.Knotts@us.indorama.net>
Subject: Indorama Ethylene Oxide Data Request

Mr. Casso,

Thank you for taking the time to meet with Indorama this week. Attached, please find the data that was presented in the meeting. If you need this information to be mailed in addition to this email, please let me know.

There is one EO emission update that we did not discuss on the call, because it does not change the total amount emitted. The EI will be updated in the near future to correct a classification error. EO emissions from an upset event in 2019 were incorrectly reported in the MSS category in the EI submittal. Those emissions are accurately reflected as upset emissions in the attached file.

Leslie Stuart
Environmental and Sustainability Manager
Indorama Ventures Oxides, LLC.

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